

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

Jamon T. Brim,)	
)	
Plaintiff)	
)	
v.)	Civil No. 5:10-CV-369-IPJ
)	
Dell Financial Services, LLC,)	
Midland Credit Management,)	
Inc., Midland Funding, LLC,)	
)	
Defendants.)	

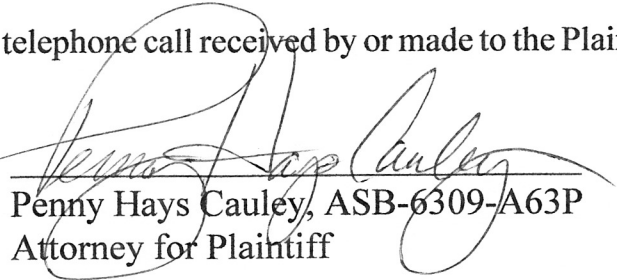
**PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT MIDLAND CREDIT
MANAGEMENT, INC., AND MIDLAND FUNDING, LLC**

Plaintiff, Jamon T. Brim, pursuant to Rule 34 of the Federal Rules of Civil Procedure, hereby serves upon Defendants Midland Credit Management, Inc., and Midland Funding, LLC (hereinafter referred to as "Midland") the following Second Requests for Production of Documents. Defendant shall produce the requested documents for inspection within 30 days of receipt of this Request.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Provide copies of all previous deposition transcripts of Angelique Purvis Ross.
2. Provide copies of all previous deposition transcripts of Grant Johnson.
3. Produce a complete copy of the new packet of training, papers, and policies that was provided to Consumer Relations employees in June/July 2010.
4. Produce a copy of all policies and procedures governing the Acquisition Department from January 2008 through the present.
5. Produce either an electronic or printed copy of the E-Oscar tutorial used to train employees in the Consumer Relations Department.

6. Produce a copy of all emails from the Compliance Department to Consumer Relations from January 2008 through the present.
7. Produce a copy of all Consumer Relations production reports, daily and weekly, by employee from January 2008 through the present.
8. Produce a copy of all emails, messages, documents or any other items which were provided to Grant Johnson for disbursement to employees that in any way address or mention the FDCPA and/or FCRA. This request is limited to January 2008 through the present.
9. Produce all documents, manuals, or other information concerning the Batch Interface System and its automated response to ACDVs.
10. Produce all documents that detail or describe your procedures for compliance with 15 U.S.C. §1681s-2(b), since January 1, 2004.
11. Produce all communications, manuals, instructional materials, training videos or tapes or other documents provided to you by the CDIA (or Equifax, Experian or Trans Union) that pertain to your reporting of a credit account as disputed and/or your use of the Metro 2 "compliance condition code" field.
12. Please produce every document that regards and/or describes each and every change which you have instituted or made to your procedures and policies for reporting disputed accounts to consumer reporting agencies after the Fourth Circuit's decision in Saunders v. Branch Banking and Trust Co. of Virginia.
13. All archived records of any telephone call received by or made to the Plaintiff.



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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Second Request for Production of Documents upon the following via email and by placing a copy of same in the United States Mail, first-class postage prepaid and properly addressed on this the 20th day of September, 2010.


Of Counsel

cc: Eric B. Langley, Esq.
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